

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

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| In the Matter of |) | |
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| Numbering Resource Optimization |) | CC Docket No. 99-200 |
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COMMENTS OF USTELECOM—THE BROADBAND ASSOCIATION

USTelecom – The Broadband Association¹ respectfully submits these comments in response to the Wireline Competition Bureau’s Public Notice² seeking comment on the New Hampshire Public Utilities Commission’s (NHPUC) Petition for additional delegated authority to implement number optimization measures in the 603 area code.³ USTelecom understands NHPUC’s desire to preserve the 603 area code for the entire state of New Hampshire but the relief requested, the trial of Individual Telephone Number (ITN) pooling as an alternative number conservation measure, would create significant burdens on the industry, is premature and is unwarranted at this time. Accordingly, USTelecom respectfully opposes the Petition.

I. The Circumstances Have Not Materially Changed Since the Commission Previously Declined to Adopt the Requested Relief

The Commission has previously considered, and declined to adopt, the ITN pooling solution that the NHPUC proposes. In 2000, the Commission declined to adopt ITN and

¹USTelecom is the nation’s leading trade association representing service providers and suppliers for the broadband innovation industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications and broadband services to hundreds of millions of customers around the world.

² *Wireline Competition Bureau Seeks Comment on New Hampshire Public Utilities Commission Petition for Additional Delegated Authority to Implement Individual Telephone Number Pooling in the 603 Area Code*, CC Docket No. 09-200, Public Notice, DA 19-495 (WCB May 31, 2019) (Petition).

³ *Petition by the New Hampshire Public Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures in the 603 Area Code*, CC Docket No. 99-200 (filed Apr. 26, 2019) (Petition).

Unassigned Number Porting (UNP) in favor of thousands-block number pooling.⁴ The Commission found that “UNP and ITN are not yet sufficiently developed for adoption as nationwide numbering resource optimization measures and conclude that ITN and UNP should not be mandated at this time.”⁵ In addition to its concern about undeveloped standards, the Commission also was “concerned with UNP’s and ITN’s potential impact on companies’ switching systems and OSSs [operational support systems] mapping logic if these methodologies lead to significant number porting.”⁶ This decision followed a series of other Commission decisions declining to delegate the authority to implement ITN and UNP to state commissions “based on the lack of final technical and administrative standards for both these methodologies and the potential for disruptions in carrier systems.”⁷ While 19 years have passed, the predicate for those concerns have not changed, and nor should the Commission’s conclusions.

II. Adopting ITN, Even on a Trial Basis, Would Be Very Burdensome

Since the Commission adopted thousands-block pooling in 2000, service providers have made required, and substantial, investments in accommodating thousand-block number pooling as a national means of conserving numbers. Given this focus, there have been no developments in the ITN standards. Simply put, the industry would be starting from the same place it was in 2000, and the burdens associated with that change are just as large now as they were in 2000 when the Commission was concerned about the implementation issues.

We acknowledge that the NHPUC has requested a trial of ITN pooling, but even a “simple” trial would have cascading impacts that are not limited simply to the trial area.

⁴ *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 (2000).

⁵ *Id.* at 7677, para. 230.

⁶ *Id.*

⁷ *Id.* at 7676, para. 229 (citing example Orders involving Massachusetts and Wisconsin).

Implementing an ITN trial would require trial participating service providers to update their number inventory management processes (some of which are highly automated) and OSSs, but also could require all service providers operating in the area (not just those participating in the trial) to augment their Local Service Management Systems (LSMSs) to add capacity because potentially every telephone number in an ITN environment would have to be on a Location Routing Number (LRN) and downloaded in each service provider's LSMS — this could come at significant expense to service providers. Further, what starts as just a trial could become significant if expanded throughout the state, or even to additional states if other states file similar petitions, calling into question the national system of thousands-block number pooling.

The Petition also would require an unjustified modification of the Pooling Administrator's systems. The NHPUC, via its Petition, seeks authority to 1) implement ITN pooling; 2) establish the Pooling Administrator (PA) (currently Somos) as the holder of blocks for assignment of individual numbers when fewer than 100 numbers are requested by a carrier; and 3) implement single number pooling trials using existing software and methods.⁸ The PA's Pooling Administration System (PAS) is not designed to support single number pooling, and would have to be modified to do so, as the Petition acknowledges.⁹ The PA and North American Numbering Plan Administrator (NANPA) functions are supported through service providers' NANP funding contributions based on their revenues reported on FCC 499As.¹⁰ It would likely be costly to make such modifications and it is not clear how such costs would be allocated

⁸ Petition at 2.

⁹ *Id.* at n.1 (“The NHPUC believes the timing may be right to include individual telephone number portability administration in the RFP for the new pooling administrator.”).

¹⁰ 47 C.F.R. § 52.17.

among the relevant stakeholders for the proposed trial; this is larger policy issue the Commission should first address.

Adopting ITN pooling, even for a trial, could also create other unjustified burdens for the carriers charged with implementing it. Practically speaking, wireline business customers often need consecutive quantities of numbers, and ITN pooling could make finding those consecutive quantities more cumbersome. ITN pooling has the potential of risking business customer dissatisfaction with the associated delays in provisioning and activation because service providers have difficulty getting the resources needed quickly, and have to create manual processes to manage inventories and provisioning differently in New Hampshire than in other states.

Finally, the Commission's existing number conservation tools such as thousand-block number pooling are working as intended and are not in threat of becoming ineffective. The Commission should allow the current number conservation efforts to continue.

Numbering policy should remain under the purview of the Commission, and the Commission should continue to address number conservation from a national resource perspective.

III. Conclusion

USTelecom appreciates New Hampshire working proactively to maintain its single-area code status but its request does not support current numbering policy at a national level and the burdens associated with doing so are not warranted at this time, particularly given the long horizon until it faces NPA exhaust¹¹ and the successful implementations other states have made when facing their own exhaust issues. For these reasons, we respectfully request the Commission to decline to delegate authority for any ITN pooling trial at this time.

Respectfully submitted,

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¹¹ Petition at n.2.